

1 District Judge Tana Lin
2
3
4
5
6
7
8

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 YANG WANG,

Case No. 2:23-cv-01117-TL

10 Plaintiff,

STIPULATED MOTION TO DISMISS
AND REMAND AND ~~PROPOSED~~
ORDER

11 v.

12 UNITED STATES CITIZENSHIP AND
IMMIGRATION SERVICES,

Noted for Consideration:
August 1, 2024

13 Defendant.

14
15 Pro Se Plaintiff Yan Wang brought this action pursuant to 8 U.S.C. §1421(c), seeking de
16 novo review of United States Citizenship and Immigration Services's ("USCIS") denial of her
17 Form N-400, Application for Naturalization. The parties have reached an agreement that will
18 resolve this case in its entirety.

19 The parties stipulate and move to dismiss this matter without prejudice, without fees or
20 costs to either party, and request that this Court remand the matter to USCIS. Once remanded,
21 Plaintiff agrees to file a new N400 application with USCIS. She further agrees to email
22 undersigned counsel when she files the N400 application and provide counsel with the receipt
23 number. USCIS agrees to schedule Plaintiff's interview in relation to the newly filed N400
24 application within 60 days of receipt and expedite the processing of her application.

STIPULATED MOTION TO REMAND AND DISMISS
[Case No. 2:23-cv-01117-TL] - 1

UNITED STATES ATTORNEY
1201 PACIFIC AVE., STE. 700
TACOMA, WA 98402
(253) 428-3800

1 Accordingly, the parties have resolved all outstanding issues and further judicial
2 intervention is unnecessary.

3 DATED this 1st day of August, 2024.

4 Respectfully submitted,

5 TESSA M. GORMAN
6 United States Attorney

7 s/ Michelle R. Lambert
8 MICHELLE R. LAMBERT, NYS #4666657
9 Assistant United States Attorney
10 United States Attorney's Office
11 1201 Pacific Avenue, Suite 700
12 Tacoma, Washington 98402
13 Phone: (253) 428-3824
14 Fax: (253) 428-3826
15 Email: [michelle.lambert@usdoj.gov](mailto: michelle.lambert@usdoj.gov)

16 *Attorneys for Defendant*

17 ***I certify that this memorandum contains 147
18 words, in compliance with the Local Civil Rules.***

19
20
21
22
23
24
YAN WANG
14739 180th Place SE
Renton, Washington 98059
Phone: 425-625-7999
Email: [yanwmandy@gmail.com](mailto: yanwmandy@gmail.com)
Pro Se Plaintiff

1 **{PROPOSED} ORDER**

2 This matter is dismissed without prejudice and without fees or costs to either party. The
3 case is remanded to United States Citizenship and Immigration Services (“USCIS”). Plaintiff
4 shall file a new N400 application and notify Defendant’s counsel of the filing and provide the
5 receipt number. USCIS shall schedule Plaintiff’s interview in relation to the new N400
6 application within 60 days of its receipt. USCIS further agrees to expedite the processing of the
7 N400 application. It is so **ORDERED**.

8
9 Dated this 2nd day of August 2024.

10 
11 Tana Lin
12 United States District Judge
13
14
15
16
17
18
19
20
21
22
23
24

CERTIFICATE OF SERVICE

I hereby certify that I am an employee in the Office of the United States Attorney for the Western District of Washington and of such age and discretion as to be competent to serve papers.

I further certify that on today's date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notice of such filing to the following CM/ECF participant(s):

- 0 -

I further certify that on today's date, I arranged for service of the foregoing on the following non-CM/ECF participant, via Certified Mail with return receipt, postage prepaid, addressed as follows:

Yang Wang, *Pro Se Plaintiff*
14739 180th Pl Se
Renton, WA 98059

DATED this 1st day of August, 2024.

s/ Stephanie Huerta-Ramirez
STEPHANIE HUERTA-RAMIREZ, Legal Assistant
United States Attorney's Office
700 Stewart Street, Suite 5220
Seattle, WA 98101
Phone: (206) 553-7970
Fax: (206) 553-4073
Email: Stephanie.Huerta-Ramirez@usdoj.gov